

Mr. Richard Karney Department of Energy ENERGY STAR Window Program

Fax: (202) 586-4617

E-mail: richard.karney@ee.doe.gov

Re: ENERGY STAR Window Proposed Revisions

Dear Mr. Karney;

I am the Branch Manager of Arch Aluminum in Kansas City, Kansas. This letter represents the position of the 75 managers and employees at this branch.

Arch, a multi-branch national company, is one of the largest fabricator and supplier of glass products to the US construction market. As a major supplier of glass products (pyrolytic **and** sputtered Low-E products) to residential window manufacturers, we have a significant interest in the outcome of the ENERGY STAR program.

Based on our experience in handling pyrolytic and sputtered Low-E products, Arch Aluminum strongly recommends the following:

## Adopt the 4-zone proposal Reject the 3-zone proposal

Based on the information presented in DOE's analysis, the 4-zone proposal saves more energy and maintains a competitive marketplace for different types of energy efficient glass products.

On that basis, the 4-zone proposal is good for the economy, the environment and more importantly for the direct consumer.

Based on the above and our position in the residential window industry, Arch/Kansas City recommends the adoption of the 4-zone proposal.

Sincerely

Scott Miller Branch Manager

cc Senator Sam Brownback (FAX 202-228-1265) Senator Pat Roberts (FAX 202-224-3514)